U-005-305.10

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CONDITIONAL APPROVAL OF OU3 WORK PLAN ADDENDUM

02/16/93

OEPA/DOE-FN
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LETTER

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State of Ohio Environmental Protection Agency
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George V. Voinovich
Governor

February 16, 1993

Mr. Jack R. Craig
Project Manager
U.S. DOE FEMP
P. O. Box 398705
Cincinnati, Ohio 45439-8705

Dear Mr. Craig

The purpose of this letter is to conditionally approve the O.U. 3 workplan. The conditions for approval are that DOE address, to Ohio EPA satisfaction, the comments on the attached pages. If you have any questions about these comments please contact Tom Schneider or me.

Sincerely,

Graham E. Mitchell
Project Manager

GEM/bjb

cc: Jenifer Kwasniewski, DERR
Tom Schneider, DERR
Jim Saric, U.S. EPA
Dennis Carr, FERMCO
Lisa August, GeoTrans
Jean Michaels, PRC
Robert Owen, ODH

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response
to ~~G-220~~ doe-0661-93
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Operable Unit 3 Work Plan

General Comments

1. Flexibility must be built into any useful work plan. Actual conditions always vary to some extent form anticipated conditions. However, the use of non-specific terms such as significant volume, representative samples, significant presence, and the like should be avoided as much as possible in work plans and in preparing the Field Work Packages (FWPs).

2. In Section 2.4.2, page 2-58, line 14, of the work plan addendum it is stated "Sampling during the RI/FS field activities will provide the primary source of information on chemical contamination of OU3." However, very little discussion on chemical sampling is presented in either document especially Section D.9. Added discussion of chemical sampling should be considered for inclusion in possible OU3 Work Plan Addendum revisions and in the Field Work Packages.

Specific Comments

1. Commenting Organization: OEPA Commentor: OEPA
Section #: 2 Pg. #:63 Line #: 17
Code: C
Original Comment #

Comment: The reference to the three buildings does not correspond to the information provided.

Response:
Action:

2. Commenting Organization: OEPA Commentor: OEPA
Section #:Appendix A Pg. #: 133 Line #: 8
Code: C
Original Comment #

Comment: DOE indicates that newer buildings will not be surveyed for asbestos if they were built after the asbestos ban went into effect. Regulations allow buildings constructed after the ban to be either certified by the architect as being "asbestos free" or an asbestos survey is required, regardless, of the construction date prior to demolition.

Response:
Action:

3. Commenting Organization: OEPA Commentor: OEPA
Section #: D.3 Pg. #: 21 Line #: 22

Code: C
Original Comment #

Comment: Define "a small number" of samples.

Response:
Action:

4. Commenting Organization: OEPA Commentor: OEPA
Section #: D.5 Pg. #: 4 Line #: 30
Code: C

Original Comment #

Comment: The field data obtained by the PID can be enhanced by using a Flame-Ionization (FID) in conjunction with the PID. A FID provides reliable field data which may improve the quality of the field data. It not as susceptible to environmental conditions and responsive to a large detection spectrum.

Response:
Action:

5. Commenting Organization: OEPA Commentor: OEPA
Section #: D.5 Pg. #: 18 Line #: 4
Code: C
Original Comment #

Comment: Rephrase sentence or explain the need to remove "surface contamination" from the steel structure prior to sampling.

Response:
Action:

6. Commenting Organization: OEPA Commentor: OEPA
Section #: D.9 Pg. #: 107 Line #: 16
Code: C
Original Comment #

Comment: The protection of personnel from unnecessary exposure to any contaminate is a very good work practice. The sentence, however, needs to justify the fact that the thorium will eventually be moved and sampling will occur at that point in time.

Response:

Action:

7. Commenting Organization: OEPA Commentor: OEPA
Section #: D.I Pg. #: 10 Line #: 4-5
Code: C
Original Comment #

Comment: The description given for the FID's use and calibration is poor. Provide further detail into this instrument's use.

Response:
Action:

8. Commenting Organization: OEPA Commentor: OEPA
Section #: D.I Pg. #: 19 Line #: Paragraph
Code: C
Original Comment #

Comment: The description given for the portable gas chromatagrah use and calibration is poor. Provide further detail into this instrument's use.

Response:
Action:

9. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.8 Pg. #: 11 Line #:
Code: C

Original Comment #

Comment: Assuming all 32 technicians will be involved 8 hours a day for the 2075 days projected to procure 829 samples,total man-hours involved in the sampling event equals 531,200. That breaks down to 640 man hours per sample. Procedures should be evaluated to increase productivity of sample collection at OU3.

Response:
Action:

10. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: Comments and Responses Pg. #: 23 Line #:
Code: C

Original Comment #

Comment: If vessel leakage of contents that are unknown or known to be of potential concern is identified by FWP inspection or by field sampling crews, ASL C analysis should be the minimum analytical level.

Response:
Action:

11. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.3.2.2 Pg. #: D.3-6 Line #: 2
Code: C
Original Comment #

Comment: The use of the non-specific term "significant volume" should be quantified or put in context of what is anticipated to be encountered (i.e. greater than one quart, five gallons, etc.) in the Field Work Packages. See General Comment No. 1.

Response:
Action:

12. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.3.2.2 Pg. #: D.3-6 Line #: 7
Code: C

Original Comment #

Comment: Quantify or elaborate by what "representative samples" in this case means. What grab and composite sampling strategies will be used? These issues should be addressed in the Field Work Packages for pond and basin sampling. See General Comment No. 1.

Response:
Action:

13. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.3.3 Pg. #: D.3-7 Line #: 30
Code: M

Original Comment #

Comment: Variability in sampling media, especially soil, is inherent. If the contaminant levels in sample results from an area investigated are considerably less than anticipated (i.e., by an order of magnitude less) from an area of known or suspected contamination, consideration should be given

to collecting additional samples for analysis. Likewise, if the sample results from an area investigated are considerably higher than anticipated from known or suspected "clean" areas, then consideration should be given to additional sample collection and analysis. This is a major consideration in the sampling effort as noted on p. D.3-17, lines 7-10.

Response:
Action:

14. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.5.1.3.2 Pg. #: D.5-11 Line #: 10
Code: M

Original Comment #

Comment: For potentially contaminated surfaces and loose media, surface swipes using a glass fiber filter wetted with hexane is proposed. Due to the hazards associated with hexane, can a substitute agent with less hazardous properties be used?

Response:
Action:

15. Commenting Organization: OEPA Commentor: GeoTrans, Inc.
Section #: D.9 Pg. #: D.9-1 Line #:
Code: C
Original Comment #

Comment: Great detail is provided for the number, location, type, and analytical history of radiological samples, however, little information is provided for chemical sample number, suspected location, type, or analytical history. Can information on chemical analysis be included in the Field Work Packages?

Response:
Action: